Feedback from the Second National EPA

Technical Assistance Grant Recipients Workshop,

February 28 - March 1, 2003

EPA provides Technical Assistance Grants (TAGs) to community groups associated with Superfund sites. The community groups use the grants to hire their own technical advisors to assist the communities in participating in the Superfund process.

On February 28 and March 1, 2003, EPA sponsored a workshop for TAG community group recipients and their technical advisors in Albuquerque.

There are currently 119 TAGs at Superfund sites. TAG community groups and technical advisors from 42 Superfund sites in 22 states participated in the workshop.

Ed Lorenz and Wilma Subra of the NACEPT Superfund Subcommittee provided an overview of the work of the Superfund Subcommittee and requested feedback from the workshop recipients. The following is a summary of the workshop feedback relative to the Superfund Subcommittee.

I. Funding

The need for adequate funding in the Superfund program was the #1 message from the workshop.

Workshop participants strongly supported an increase in funding to the level of a fully funded Superfund program.

The current level of funding is not adequate to fully implement the entire Superfund program. The workshop participants requested the NACEPT Superfund Subcommittee recommend an increase in funding from the current funding level to a level that will be sufficient to implement the entire Superfund program.

II. Reinstate The Superfund Tax

Workshop participants strongly supported the reinstatement of the Superfund tax.

III. NPL Listing

All sites that qualify for listing at the Federal level should be listed. Sites that qualify for listing should not be omitted due to the lack of financial resources.

IV. Remedial Actions

All fund led sites that are ready for remedial actions should have adequate resources to initiate and completely implement the required actions.

All fund led sites currently in the remedial action phase should have the required financial resources to fully implement the remedial actions on an ongoing basis.

Remedial actions should not be selected based on financial resources and cost to the detriment of appropriate, implementative and protective short and long term remedies.

Remedial actions have moved more towards containment and less towards treatment and permanent remedies. This trend should be reversed to more appropriately protect human health and the environment.

Remediation of Ecological Risk should not be considered secondary to Human Health Risk. Particular emphasis should be placed on Eco Risk that impact species used for human consumption and indigenous ceremonies.

Brownfield resources should not be used for Superfund site stabilization when the Brownfield focus is used as the driver to enable lesser protective remedy due to proposed future land use.

V. Legal Resources

The Superfund program lacks adequate resources to bring PRPs to the table at fund led sites.

VI. Measuring Program Performance

Community involvement and participation in the Superfund process needs to be a part of program assessment. Community knowledge is not inferior to the expertise brought by agency staff and PRPs and it needs to be sought and valued.

Use of TAG process needs to be assessed as part of program measurement. Remediations planned without community based technical input are likely to fail.

Community evaluation of site remedial activities needs to be empowered through the TAG process.

VII. Technical Assistance Grants

Increase community involvement through an increase in the number of TAGs and community outreach mechanisms.

Increase the scope of the TAGs to include health studies and legal issues.

Insure adequate resources to fully implement the TAG program.

VIII. Community Involvement

Communities should be the primary stakeholder in all Superfund remedial selection and implementation processes.

Communities must be afforded the opportunity for early, meaningful and full participation in all phases of the Superfund program including early discussions and the planning processes. Communities should be able to participate in all meetings between PRPs, federal, state and local government agencies in the development, reviewing and implementing of all aspects of the Superfund process. (Exception - financial negotiations between government agencies and the PRPs and during negotiations of consent decrees.)

More consistency in implementing the program should be developed across regions. The interaction between remedial project managers and communities regarding participation in program site planning, document reviews and site decisions needs to be addressed.

Few of the TAG recipients (other than those linked to Wilma or Ed) knew of the work of the Superfund Subcommittee and, perhaps, of most concern, did not know we were holding meetings in Phoenix or New Bedford. We need to do a good job of informing community organizations at NPL sites of our activities. As a result of the presentation at the TAG workshop, EPA has sent a notice to all TAG groups and all EPA community advisory groups (CAGs) about the upcoming meetings of the subcommittee.